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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

**FEDERAL TRADE COMMISSION,**  
Plaintiff,

v.

**ADEPT MANAGEMENT, INC., et al.,**  
Defendants,

Case No: 1:16-cv-00720-CL

**JOINT MOTION TO EXTEND  
COURT-IMPOSED DEADLINES  
CONCERNING DISPOSITIVE  
MOTIONS**

Plaintiff, Federal Trade Commission (“FTC”), Defendants Hoyal & Associates, Inc.,  
Jeffrey Hoyal, Lori Hoyal (collectively, the “Hoyal Defendants”), and Defendants Reality Kats,  
LLC and Dennis Simpson (collectively, the “Simpson Defendants”), by and through undersigned

counsel, and *pro se* Defendants ,Colleen Kaylor, Laura Lovrien, Noel Parducci, Lydia Pugsley, and William Strickler, hereby jointly submit this motion, pursuant to Local Rule 16-3, to extend the Court-imposed deadlines concerning dispositive motions. *Pro se* Defendants Linda Babb and Shannon Bacon did not attend the meet and confer session in which this motion was discussed and did not respond to email communications in which the draft motion and proposed order were circulated. In compliance with LR 7-1, the parties made a good faith effort through telephone conferences and email communications to resolve the dispute and have been unable to do so.

The aforementioned parties have agreed to a tentative expert deposition schedule. Due to the scheduling limitations of parties, counsel, and experts, the four depositions must occur on a handful of days between July 15 and July 31, when expert discovery ends, ECF No. 289. To accommodate the scheduling limitations, the parties have tentatively agreed for the last two depositions to occur on July 30 and 31. However, holding the depositions on July 30 and 31 will make it difficult to receive the deposition transcripts and incorporate them, to the extent necessary, in any dispositive motion, presently due on August 3. *Id.* Therefore, having agreed that good cause exists, the aforementioned parties hereby jointly and respectfully move the Court to extend the deadlines related to dispositive motions by one week. The extension would have the following effect on deadlines already fixed by Court order:

	Existing Date (ECF No. 289)	Proposed Date
Dispositive motions, including motions for summary judgment, due	8/03/2018	8/10/2018
Responses to dispositive motions due	8/21/2018	8/28/2018
Replies to dispositive motions due	8/31/2018	9/7/2018
Oral argument on dispositive motions	9/7/2018, 9 a.m.	9/14/2018, 9 a.m.

The proposed extension would have no impact on any other existing deadlines, settings, or schedules in this case.

THEREFORE, the aforementioned parties respectfully request that this Court enter the attached proposed Order to Extend Court-Imposed Deadlines Concerning Dispositive Motions.

Respectfully submitted,

Dated: July 3, 2018

s/Krista K. Bush

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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Federal Trade Commission, 915 Second Avenue, Suite 2896, Seattle, WA 98174, and that pursuant to Rule 5(b), Fed. R. Civ. P., a copy of the Joint Motion to Extend Deadlines Concerning Dispositive Motions was served as follows:

By ECF on each of the following:

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